

REMARKS

Favorable reconsideration and allowance of the present application are respectfully requested in view of the following remarks. Claims 1-23 were pending prior to the Office Action. Claims 24-32 are added through this reply. Therefore, claims 1-32 are pending. Claims 1, 7, 9, 10 and 14 are independent.

ALLOWABLE SUBJECT MATTER

Applicants appreciate that the Examiner considers claims 19-20 and 22-23 to include allowable subject matter.

§ 102 REJECTION – BOIES

Claims 1, 3, 9, 11-12 and 14-15 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by Boies et al. (U.S. Patent 5,426,732). *See Office Action, Items 3-4.* Applicants respectfully traverse.

Referring to Figure 1 of Boies, the Examiner alleges that the frame capture buffer 24 and the display buffer 28 are equivalent to the first and second memory as recited in claim 1. However, Boies clearly indicates that the display buffer 28 is merely a conventional display buffer provided to a display screen 30 having graphical capability. *See Boies, Column 4, lines 40-42.* As such, the display buffer 28 is volatile.

This is in complete contrast to claim 1 which recites, “wherein said second memory is a non-volatile memory.” Clearly, Boies cannot teach or suggest at least this feature. Indeed, Boies teaches against such a feature. For at least this reason, independent claim 1 is distinguishable over Boies.

Independent claim 9 recites, in part “wherein the second memory is a non-volatile memory.” It is clear that Boies cannot teach or suggest at least this feature and therefore, claim 9 is distinguishable over Boies.

Independent claim 14 recites, in part, “wherein the second memory is a non-volatile memory.” It is clear that claim 14 is distinguishable over Boies.

Claims 3, 11-12 and 15 depend from independent claims 1, 9 and 14 directly or indirectly. Then for at least due to the dependency thereon, these dependent claims are also distinguishable over Boies.

Applicants respectfully request that the rejection of claims 1, 3, 9, 11-12 and 14-15 based on Boies be withdrawn.

§ 103 REJECTION – BOIES, USAMI

Claims 2 and 16-17 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Boies in view of Usami (U.S. Patent 6,677,988). *See Office Action, Items 5-6.* Applicants respectfully traverse.

Claims 2 and 16-17 depend from independent claims 1 and 14 directly or indirectly. It is demonstrated above that claims 1 and 14 are both distinguishable over Boies. Usami is not relied upon to correct for at least the above noted deficiencies of Boies. Therefore, independent claims 1 and 14 are distinguishable over the combination of Boies and Usami. Then for at least due to the dependency thereon, claims 2 and 16-17 are also distinguishable over the combination of Boies and Usami.

It is also noted that Usami cannot be properly combined with Boies as the Examiner alleges. Boies is directed toward a process control system to provide a user

interface for displaying information related to a controlled process and to receive input from a user of the system. More specifically, as illustrated in Figure 1, camera 12a captures an image of the subject and provides a video signal 12b which is processed and a plurality of next states 30b-30g derived and displayed. As illustrated in Figure 2a, the plurality of next states 30b-30g all relate to the potential positioning of the subject in the next state. For example, the next state 30b is a derived image in which the camera is panned to the right, 30c is a derived of the camera panning to the left, etc. Based on the user selection, the camera is repositioned accordingly by controlling the zoom and pan motors. *See Boies, Column 5, lines 61 - Column 6, line 15.* In other words, Boies is directed toward controlling the camera's panning and zooming operations to properly position the subject within the image next time the subject is photographed.

However, the Examiner alleges that Usami teaches storing a plurality of images generated by processing an image with different color temperatures. For the sake of argument, Applicants assume that the Examiner's allegation regarding Usami to be true. Even if the Examiner's allegation is taken as such, then Boies would be modified to display as potential next states images with different color variations instead of different physical locations. When this occurs, the user would not be able to select the next state to control the panning and zooming operations of the camera. This would render Boies unsatisfactory for its intended purpose. Then by definition, there is no motivation to combine Boies and Usami. Thus, any rejection based on a combination of Boies and Usami is improper.

For at the reasons stated above, Applicants respectfully request that the rejection of claims 2 and 16-17 based on Boise and Usami be withdrawn.

§ 103 REJECTION – BOIES, MORIYA

Claims 2, 5, 7-8, 10, 13, 16-18 and 21 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Boies in view of Moriya et al. (U.S. Patent 5,754,709). *See Office Action, Item 7.* Applicants respectfully traverse.

Claims 2 and 5 depend from independent claim 1, and it is demonstrated above that claim 1 is distinguishable over Boies. Moriya is not relied upon to correct for at least the above noted deficiencies of Boies. Therefore, claim 1 as well as the dependent claims 2 and 5 are distinguishable over the combination of Boies and Moriya.

Further, Boies and Moriya cannot be combined as suggested by the Examiner. In the Office Action, the Examiner alleges that Moriya teaches a method for gradation correction and image edge extraction. For the sake of argument again, Applicants will treat the Examiner's allegation regarding Moriya to be true. If Boies is modified by the teachings of Moriya as the Examiner alleges, then the plurality of the next state images displayed in Boies would merely be images processed with different edge extraction and gradation parameters. This would not allow the user to select an image to control the pan and zooming operations to properly position the subject of the image, which renders Boies unsatisfactory for its intended purpose. Thus, contrary to the Examiner's allegation, there is no motivation to combine Boies with Moriya and any rejection based on the combination is improper.

Yet further, the Examiner alleges that the image dividing means 2 as illustrated in Figures 4(a) and 4(b) of Moriya is equivalent to the divider circuit as recited in claim 5. It is noted that the divider circuit as recited divides the image signal into a highlight area and a shadow area.

In contrast, Moriya clearly states that the image dividing means 2 merely extracts an image block which measures $M \times N$ pixels with a center point at (X, Y) . *See Moriya, Column 5, lines 37-50.* The image dividing means 2 does not determine whether a particular area is dark or light. Therefore, Moriya cannot teach or suggest a divider circuit as recited in claim 5.

Regarding independent claim 7, it is demonstrated above that Boies cannot be combined with Moriya to reject the claims. For at least this reason, claim 7 is distinguishable over the combination of Boies and Moriya.

The following is also noted. The Examiner alleges that Moriya teaches an image synthesizing means 5 that synthesizes image that are processed separately. It appears that the Examiner is alleging that the next state images 30b-30g as illustrated in Boies may be synthesized to a single image with the image synthesizing means 5 of Moriya. The Examiner's logic fails.

First, as illustrated in Figures 4(a) and 4(b) in Moriya clearly indicates that the image synthesizing means synthesizes a single image either from the gradation correction means or from the edge extracting means. There is no indication whatsoever that the image synthesizing means synthesizes more than one image.

Second, even if the image synthesizing means as described in Moriya can somehow be utilized to synthesize more than one image, the result would be useless

for Boies. As mentioned many times above, Boies is directed toward allowing the user to select a particular next state image so that the pan and zoom operations of the camera can be effected to properly position the subject. Synthesizing the next state images of Boies simply does not make sense to achieve this purpose. Clearly, independent claim 7 is distinguishable over the combination of Boies and Moriya.

For similar reasons, independent claim 10 is also distinguishable over the combination of Boies and Moriya.

Claims 16-18 and 21 depend from independent claim 14, and it is demonstrated above that Boies cannot teach or suggest all features of claim 14 as recited. Moriya is not relied upon to correct for at least this deficiency of Boies. Thus, claim 14 as well as the dependent claims 16-18 and 21 are distinguishable over the combination of Boies and Moriya. Further, Boies and Moriya is not a proper combination as clearly demonstrated above.

Applicants respectfully request that the rejection of claims 2, 5, 7-8, 10, 13, 16-18 and 21 based on Boies and Moriya be withdrawn.

§ 103 REJECTION – BOIES

Claims 4, 6 and 18 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Boies. *See Office Action, Item 8.* Applicants respectfully traverse.

Claims 4, 6 and 18 depend from independent claims 1 and 14 directly or indirectly, and it is demonstrated above that claims 1 and 14 are distinguishable over Boies. Then for at least due to the dependency thereon, these dependent claims are also distinguishable over Boies.

Further, the dependent claims are also distinguishable on their own merit. For example, claim 4 directly depends from claim 3 and claim 3 recites, in part “wherein each of said plurality of image processor corresponds to one of a plurality of display units” and “each of said plurality of image processors processing, according to the parameters, the plurality of second image signals to be displayed on one of the plurality of display units which corresponds to said image processor.” In other words, each of the second image signal stored is generated to be displayed by a specific display device.

Contrary to the Examiner’s allegation, Boies only teaches generating the next state images. Boies is completely silent regarding particularizing each of the next state images for a display. Indeed, Boies does not even recognize the differences in the display capability of display devices such as a printer or a display screen. In other words, Boies cannot teach or suggest the features as recited in claim 3. Then it naturally follows that Boies cannot teach or suggest the features as recited in claim 4 that directly depends from claim 3.

Regarding claim 6, the Examiner alleges that the use of detachably connected memory is well known, and therefore having the second memory being detachable as recited in claim 6 is obvious. Then the Examiner is alleging that the display buffer 28, which is merely a working memory buffer is detachable. But one of ordinary skill would not use a detachable memory as a display buffer in the manner suggested by the Examiner. Thus, contrary to the Examiner’s allegation, there would be no motivation to replace the display buffer 28 with the detachable memory.

Claim 18 directly depends from claim 17 and claim 17 recites “wherein the step of generating the plurality of second image data includes particularizing at least one second image data for a display type.” It is demonstrate above that Boies does not teach particularizing image data for any type of display. Thus, Boies fails to teach the features of claim 17 and thus also fails to teach the feature of claim 18.

In addition, Applicants respectfully challenge all official notice taken.

For at least the reasons stated above, Applicants respectfully request that the rejection of claims 4, 6 and 18 based on Boies be withdrawn.

NEW CLAIMS

Though this reply, claims 24-32 are added. All new claims are believed to be distinguishable over the cited references, individually or in any combination, for at least due to the dependencies from independent claims. Applicants respectfully request that the new claims be allowed.

CONCLUSION

All objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance. Should there be any outstanding matters that need to be resolved, the Examiner is respectfully requested to contact Hyung Sohn (Reg. No. 44,346), to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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